

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In re:

Case No: 6:18-bk-02137-ABB
Chapter 13

RAHEEM PONTIFLET,

Debtor.

MOTION FOR WAGE DEDUCTION

Comes now the Debtor, RAHEEM PONTIFLET, by and through the undersigned Counsel and files this Motion for Wage Deduction, and in support thereof states as follows:

1. The Debtor filed this case on April 13, 2018.
2. The Order Establishing Deadline for Making Payments ordered Debtor to begin monthly payments on May 13, 2018.
3. The Debtor's current Chapter 13 plan payment is \$1,500.00 monthly.
4. The Debtor is employed by the Orange County Board of County Commissioners ("Employer").
5. Debtor is paid biweekly, with two pay periods in a typical month, and with some months containing three pay periods.
6. Since the Debtor's monthly payment exceeds his biweekly net pay, Debtor requests that Employer deduct \$750.00 from the first pay period of the month, and deduct an additional \$750.00 from the second pay period of the month.
7. Under this proposed Wage Deduction, Employer would not deduct any funds from Debtor's third monthly pay period for months having more than two pay periods.

WHEREFORE, Debtor requests this Court grant this Motion for Wage Deduction, to direct the Employer to deduct the monthly payments from Debtor's wages as prescribed, and such other relief that the Court may deem just and proper.

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing motion has been sent by either electronic transmission or U.S. Mail, this 13th day of June, 2018, to: Raheem Pontiflet, 3756 Dartford Dr., Davenport, FL 33837; Orange County Board of County Commissioners, PO BOX 38, Orlando, FL 32802; and Laurie K. Weatherford, Trustee, (via CM/ECF).

/s/Jeffrey S. Badgley
JEFFREY S. BADGLEY
Florida Bar No.: 0599417
Badgley Law Group
801 N. Magnolia Ave., Suite 107
Orlando, FL 32803
Tel: (407) 781-0420
Fax: (407) 781-0706
Attorney for Debtor(s)
jbadgley@Badgleylawgroup.com